

UNITED STATES DISTRICT COURT

for the
Middle District of North Carolina

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

INFORMATION ASSOCIATED WITH DISCORD
ACCOUNTS, THAT IS STORED AT PREMISES
CONTROLLED BY DISCORD

Case No. 1:20MJ287-1

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A

located in the Northern District of California, there is now concealed (identify the person or describe the property to be seized):

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
18 U.S.C. § 924(b); 18 U.S.C. § 922(a)(6); 18 U.S.C. § 2252A(a)(5)(B).	Receipt or transport of a firearm or ammunition in interstate commerce with the intent to commit a felony; knowingly providing false information in connection with the acquisition of a firearm; Receipt and/or possession of child pornography.

The application is based on these facts:

See attached Affidavit of FBI Special Agent Christopher McMaster

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

/s/ Christopher McMaster

Applicant's signature

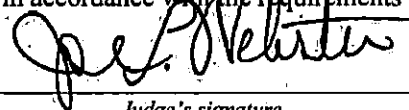
Christopher McMaster, Special Agent, FBI

Printed name and title

On this day, the applicant appeared before me via reliable electronic means, that is by telephone, was placed under oath, and attested to the contents of this Application for a search warrant in accordance with the requirements of Fed. R. Crim. P. 4.1.

Date: 10/06/2020 11:46am

City and state: Durham, North Carolina



Judge's signature

Hon. Joe L. Webster, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

IN THE MATTER OF THE SEARCH
OF INFORMATION ASSOCIATED
WITH DISCORD ACCOUNTS, THAT
IS STORED AT PREMISES
CONTROLLED BY DISCORD

Case No. 1:20MJ287-1

**AFFIDAVIT IN SUPPORT OF AN
APPLICATION UNDER RULE 41 FOR A
WARRANT TO SEARCH AND SEIZE**

I, Christopher McMaster, being first duly sworn, hereby depose and
state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search
warrant for information, involving customer records, communications, and
the content of communications, for Discord accounts with the following
account usernames or associated account identifiers: Thanos Car#8616, user
ID of 379095882198548481; Mikeykosotorellic#7938; Deleted User
804f67fb#4994; gasmertime@gmail.com; dogeborger@gmail.com;
moppyflopper@gmail.com; asdadsasdasddasasdsdaa@gmail.com; and
gamerclub9999@gmail.com that is stored at the premises owned, maintained,
controlled, or operated by, Discord, an electronic communication service

provider and remote computing service provider, located at 401 California Dr, Burlingame, CA 94010. *See* 18 U.S.C. §§ 2510(15) and 2711(2).

2. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A), and 2703(c)(1)(A) and Rule 41 of the Federal Rules of Criminal Procedure to require Discord to disclose to the government the information further described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review the information to locate items described in Section II of Attachment B.

3. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been since May 2019. I have been assigned to the Joint Terrorism Task Force (JTTF) in the Charlotte Division of the FBI and am primarily responsible for conducting counterterrorism investigations. I have received training in conducting criminal and counterterrorism investigations, searches and seizures, and effecting arrests. I have participated in investigations that involved evidence derived from electronic media and electronic communication platforms.

4. I have personally participated in the investigation of the offenses discussed below. The facts and information contained in this affidavit are based upon my personal knowledge, information obtained from federal and state law enforcement officers, and information obtained from interviews and analysis of reports. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

JURISDICTION

5. This Court has jurisdiction to issue the requested warrant because it is "a court of competent jurisdiction" as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A), & (c)(1)(A). Specifically, the Court for the Middle District of North Carolina is "a district court of the United States ...that has jurisdiction over the offense being investigated." 18 U.S.C. § 2711(3)(A)(i).

DEFINITIONS

6. The following definitions apply to this AFFIDAVIT and Attachment B:

a. "Child pornography," as defined in 18 U.S.C. § 2256(8), is any visual depiction, including any photograph, film, video, picture, or computer

or computer-generated image or picture, whether made or produced by electronic, mechanical or other means, of sexually explicit conduct, where (a) the production of the visual depiction involved the use of a minor engaged in sexually explicit conduct, (b) the visual depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaged in sexually explicit conduct, or (c) the visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaged in sexually explicit conduct.

b. "Computer," as used herein, refers to "an electronic, magnetic, optical, electrochemical, or other high-speed data processing device performing logical or storage functions, and includes any data storage facility or communications facility directly related to or operating in conjunction with such device" and includes smartphones, and mobile phones and devices. See 18 U.S.C. § 1030(e)(1).

c. "Computer hardware," as used herein, consists of all equipment that can receive, capture, collect, analyze, create, display, convert, store, conceal, or transmit electronic, magnetic, or similar computer impulses or data. Computer hardware includes any data-processing devices (including central processing units, internal and peripheral storage

devices such as fixed disks, external hard drives, “thumb,” “jump,” or “flash” drives, which are small devices that are plugged into a port on the computer, and other memory storage devices); peripheral input/output devices (including keyboards, printers, video display monitors, and related communications devices such as cables and connections); as well as any devices, mechanisms, or parts that can be used to restrict access to computer hardware (including physical keys and locks).

d. “Computer passwords and data security devices,” as used herein, consist of information or items designed to restrict access to or hide computer software, documentation, or data. Data security devices may consist of hardware, software, or other programming code. A password (a string of alpha-numeric characters) usually operates what might be termed a digital key to “unlock” particular data security devices. Data security hardware may include encryption devices, chips, and circuit boards. Data security software may include programming code that creates “test” keys or “hot” keys, which perform certain pre-set security functions when touched. Data security software or code may also encrypt, compress, hide, or “booby-trap” protected data to make it inaccessible or unusable, as well as reverse the process to restore it.

e. "File Transfer Protocol" ("FTP") is a standard network protocol used to transfer computer files from one host to another over a computer network, such as the Internet. FTP, built on client-server architecture, uses separate control and data connections between the client and the server.

f. "Internet Protocol address" or "IP address," as used herein, refers to a unique number used by a computer or other digital device to access the Internet. Every computer or device accessing the Internet must be assigned an IP address so that Internet traffic sent from and directed to that computer or device may be directed properly from its source to its destination. Most Internet Service Providers (ISPs) control a range of IP addresses. IP addresses can be "dynamic," meaning that the ISP assigns a different unique number to a computer or device every time it accesses the Internet. IP addresses might also be "static," if an ISP assigns a user's computer a particular IP address that is used each time the computer accesses the Internet. ISPs typically maintain logs of the subscribers to whom IP addresses are assigned on particular dates and times.

g. "Internet Service Providers" ("ISPs"), as used herein, are commercial organizations that are in business to provide individuals and

businesses access to the Internet. ISPs provide a range of functions for their customers including access to the Internet, web hosting, e-mail, remote storage, and co-location of computers and other communications equipment.

h. The "Internet" is a global network of computers and other electronic devices that communicate with each other. Due to the structure of the Internet, connections between devices on the Internet often cross state and international borders, even when the devices communicating with each other are in the same state.

i. "Minor," as defined in 18 U.S.C. § 2256(1), refers to any person under the age of eighteen years.

j. "Records," "documents," and "materials," as used herein, include all information recorded in any form, visual or aural, and by any means, whether in handmade, photographic, mechanical, electrical, electronic, or magnetic form.

k. "Sexually explicit conduct," as defined in 18 U.S.C. § 2252A(a)(5)(B), means actual or simulated (a) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex; (b) bestiality; (c)

masturbation; (d) sadistic or masochistic abuse; or (e) lascivious exhibition of the genitals or pubic area of any person.

l. A “storage medium” is any physical object upon which computer data can be recorded. Examples include hard disks, RAM, floppy disks, flash memory, CD-ROMs, and other magnetic or optical media.

m. A “website” consists of textual pages of information and associated graphic images. The textual information is stored in a specific format known as Hyper-Text Mark-up Language (“HTML”) and is transmitted from web servers to various web clients via Hyper-Text Transport Protocol (“HTTP”).

n. “Visual depiction,” as defined in 18 U.S.C. § 2256(5), includes undeveloped film and videotape, data stored on computer disc or other electronic means which is capable of conversion into a visual image, and data which is capable of conversion into a visual image that has been transmitted by any means, whether or not stored in a permanent format.

DISCORD ACCOUNTS & SERVICES

7. Discord provides free hosting for registered users to set up, configure, and customize their own communication servers, as well as user

text chat rooms. Discord is a web-based service which can be accessed via web browser or by installing an application for a Windows, iOS, or Android device.

8. Users register for the service with an email address, username, and password; after registering users have access to all of Discord's features, including voice calls and chat rooms. Discord is an instant messaging service that provides both text and voice communication. Discord conversation logs are saved to a "Chats" area in the user's Discord account. Discord account users can link other social media and entertainment services to their Discord account and can automatically integrate features of those applications such as Google+. Discord stores identifying information (such as the email address used to register an account and a history of IP addresses), and usage information (such as chat logs, login sessions, and device information). Discord also collects information from any third-party application linked to a user's profile. The user account for a Discord account is alphanumeric username, which is then combined with a pound symbol (#) as well as a string of 4 or 5 randomized numbers, producing a unique "tag." The tag is publicly visible on an account's profile and can be used for a variety of

networking purposes inside of Discord, such as friend lists, server whitelists, and blocking other users.

PROBABLE CAUSE

9. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe TREISMAN received or transported firearms with the intent to commit a felony offense, in violation of Title 18, U.S.C. § 924(b), knowingly provided false information in connection with the acquisition of a firearm, in violation of Title 18, U.S.C. § 922(a)(6), and possessed child pornography, in violation of 18 U.S.C. § 2252A(a)(5)(B), (the "Subject Violations").

10. Specifically, TREISMAN used a false name to purchase a Kel-Tec firearm, and he received and transported firearms and ammunition in interstate commerce with the intent to commit an offense punishable by imprisonment for a term exceeding one year.¹ Additionally, a wireless

¹ There is probable cause to believe that information maintained by Discord contain evidence that would show that TREISMAN has planned, discussed and/or intends to carry out a mass shooting or other targeted act of violence, punishable under numerous United States criminal statutes and North Carolina criminal statutes, including but not limited to the following: threats against former Presidents and certain other persons, in violation of 18 U.S. Code §.879; Congressional, Cabinet, and Supreme Court assassination,

telephone and other electronic storage devices belonging to TREISMAN were reviewed by the FBI pursuant to search warrants and found to contain evidence of child pornography.

11. Based upon my training and experience, those who possess firearms unlawfully or for an unlawful purpose, often display those firearms on social media platforms, instant messaging or other applications, and or make statements about the firearms by utilizing computers and wireless telephones. Additionally, those who receive and possess child pornography also do so on social media platforms, instant messaging, or other applications by using computers and wireless telephones.

kidnapping, and assault, in violation of 18 USC 351(c); felonious assault with deadly weapon with intent to kill or inflicting serious bodily injury, a Class C felony, in violation of North Carolina General Statute (NCGS) section 14-32; assault inflicting serious bodily injury, a Class F felony, in violation of NCGS section 14-32.4; murder in the second degree, a Class B1 felony, in violation of NCGS section 14-17(b); and murder in the first degree, a Class A felony, in violation of NCGS section 14-17(a). The act contemplated by TREISMAN is similarly punishable in any state by imprisonment for a term exceeding one year. Further, there is probable cause to believe that evidence related to his unlawful purchase and transportation of firearms is also contained on Discord.

KANNAPOLIS POLICE DEPARTMENT INVESTIGATION

12. On May 28, 2020 at approximately 11:00 a.m., KPD officers responded to a report of an abandoned vehicle in the parking lot of the Fifth Third Bank, 606 South Main Street, Kannapolis, North Carolina. Bank employees first noticed the vehicle in the parking lot around closing time on May 27, 2020. No one was around the van at the time.

13. The KPD officers identified the abandoned vehicle as a white Ford E350 van, bearing expired California license plate 8E43177. The officers ran the license plate and obtained an associated Vehicle Identification Number (VIN) but were unable to locate identifying information about the registered owner. Further, the officers were unable to confirm the VIN associated with the license plate matched the VIN on the van because a parking pass covered the VIN plate.

14. The KPD officers looked through the van windows to determine whether anyone was inside the van and observed an AR-15 style rifle behind the driver's seat; a box for a Taurus .380 handgun laying in the passenger

floorboard; a canister of Tannerite²; and a box of 5.56 caliber ammunition. Officers then checked the van doors and found the back-right side door was unlocked. Officers opened the van door to determine whether anyone was inside needing help. Officers did not find anyone but observed several gun cases in the back of the van.

15. The bank branch manager signed a Property Owner Tow Request, asking KPD to tow the van. The KPD officers initiated an inventory search of the vehicle pursuant to KPD policy. The officers found several firearms; books about survival, bomb making, improvised weapons, and Islam; and a large amount of cash banded and sealed in bank bags, estimated to be hundreds of thousands of dollars³.

16. The KPD officers terminated the inventory search; towed the van to the KPD secure storage facility; and obtained a state search warrant for

² Tannerite is a binary explosive often used by target shooters. Tannerite is popular because it produces a loud bang and smoke when hit by a bullet. Tannerite is legal to own and transport in its unmixed form.

³ TREISMAN later told JTTF Investigators the cash was his inheritance from his father. FBI agents confirmed through TREISMAN's mother that he received a sizable inheritance. FBI agents spoke with employees of a bank in Long Beach, California and confirmed TREISMAN withdrew the money in cash on or about January 10, 2020.

the van. Pursuant to the state search warrant, the officers discovered the following firearms in the van:

- a. Sig Sauer (Sig Sauer Inc, Exeter, NH USA) AR rifle, unknown caliber, unknown model, Serial Number (SN) 20J041880;
- b. Intratec 9mm Luger, model TEC-DC9, SN D125073;
- c. Lower AR receiver – Anderson Manufacturing, model AM-15, multi-caliber, SN 16195421;
- d. Kel-Tec Sub-2000, SN FTC43;
- e. A rifle marked ArchAngel (possibly a Ruger 10/22 rifle) .22 caliber, SN 259-20969; and
- f. Russian Mosin Nagant M91/30, bolt action rifle, 7.62 x 54R (PW Arms Redmond, Washington), Russian SN RMN042789 (6622 on bolt and trigger well).

17. After the van was towed and KPD officers left, a bank employee again contacted KPD. The employee reported that a white male (later identified as TREISMAN) arrived at the Fifth Third Bank driving a green Honda Accord, pulled into teller drive-through lane #2, and asked about his white van being towed.

18. KPD officers responded to the bank and encountered TREISMAN waiting in the green Honda in the drive-through teller lane. The officers conducted a felony traffic stop and ordered TREISMAN out of the Honda. While detained, TREISMAN was asked by officers whether he had anything that would harm them. Later, TREISMAN made a spontaneous utterance in which he advised that there was a gun in the Honda. A Cabarrus County Deputy K-9 handler assessed the Honda with her explosive-trained K-9 and observed the K-9 exhibiting a strong change in behavior when being walked around the front of the car. According to the handler, the strong change in behavior involved the K-9's nostrils flaring, the dog breathing heavy, changing its posture, and wanting to get on top of the hood of the Honda. According to the KPD report, this alert indicated the possibility of explosives, but not necessarily, as the K-9 was trained to sit when there was a positive alert.

19. The Cabarrus County bomb squad arrived and examined the Honda to determine whether explosive materials were present. Bomb tech officers used a robot to open the vehicle's door and examine the interior, after which they observed a handgun in the front of the vehicle, near the stereo system. A bomb tech officer donned a bomb suit and continued examining the

vehicle. The bomb tech officer located a second handgun in a clothes hamper. The bomb tech officers did not locate any explosive material in the Honda.

20. KPD officers obtained a state search warrant for the Honda and seized the firearms. KPD officers identified the first firearm, found near the stereo system, as a Taurus Spectrum .380 caliber, SN 1F039977. KPD officers identified the second firearm, found inside the clothes hamper, as an Intratec 9mm Luger Model AB-10, SN A050018.⁴ They also located TREISMAN's wallet in the cupholder between the seats. In addition to other items, the wallet contained the following, each with a photograph of TREISMAN:

- a. State of Washington Identification Card for Alexander Hillel TREISMAN, with date of birth December 19, 2000;
- b. State of California Driver License, for Alexander Hillel TREISMAN, with date of birth December 19, 2000; and

⁴ Dylan Klebold and Eric Harris carried out the shootings at Columbine High School using an Intratec TEC-9, among other weapons. While the TEC-9 is not illegal to own, the firearm is not designed for practical use, such as concealed carry, accurate target shooting, or hunting. JTTF Investigators have not determined TREISMAN purchased his TEC-9s because of their use in the Columbine shootings; however, we note that TREISMAN owns not one, but two of the firearms used in one of the most famous school shootings.

- c. State of Florida Driver License, for Alexander S. Theiss, with date of birth March 29, 1995.⁵

21. KPD officers arrested TREISMAN for carrying concealed weapons. During a search incident to the arrest, KPD officers seized from TREISMAN a Samsung S9 wireless telephone, uniquely identified by IMEI 353306090607320, and associated with telephone number (206) 293-0658, which had been in his right front pants pocket. Additional electronic devices were seized pursuant to the previously referenced search warrants pertaining to the van and the Honda associated with TREISMAN. Subsequently, these devices have been seized by Charlotte FBI pursuant to a Federal search warrant and have been searched for material involving the sexual exploitation of minors.

22. KPD notified FBI agents and Task Force Officers with the FBI Charlotte JTTF (hereafter "JTTF Investigators") of their investigation and the arrest of TREISMAN.

⁵ The Florida Driver License displayed a star in the upper right-hand corner, purporting to be Real ID compliant. JTTF Investigators contacted the Florida Department of Law Enforcement and learned the Driver License is counterfeit.

INITIAL INTERVIEW

23. JTTF Investigators viewed via closed circuit television an interview of TREISMAN conducted by KPD officers at KPD headquarters. The officers issued *Miranda* warnings and TREISMAN waived his rights and agreed to speak. During that interview, TREISMAN provided his telephone number as (206) 293-0658. KPD officers asked TREISMAN about hand drawings of swastikas, a plane crashing into a building, and destroyed buildings, and the books found in his van. TREISMAN conveyed to the interviewing officers that he had an interest in terrorist incidents and mass shootings, and that he watched YouTube videos and read Wikipedia articles about such incidents. KPD officers also asked TREISMAN about his friends and family. TREISMAN conveyed that many of his friends had recently stopped interacting with him because of remarks and jokes he made in reference to incidents such as mass shootings and the 9/11 terrorist attacks. TREISMAN denied having an intent to harm anyone.

JTTF INTERVIEW OF ALEXANDER TREISMAN

24. The next day, JTTF Investigators interviewed TREISMAN at the Cabarrus County Jail. Prior to any questioning, the JTTF Investigators presented and reviewed an Advice of Rights form with TREISMAN.

TREISMAN agreed to speak to the JTTF Investigators and signed the form, waiving his rights. The JTTF Investigators then explained that lying to federal agents is a crime and showed TREISMAN a copy of 18 U.S.C. § 1001. TREISMAN initialed the copy of the statute indicating he understood. The JTTF Investigators then stated they were not questioning TREISMAN regarding any of the state charges but were concerned only with possible terrorism. TREISMAN indicated he understood.

25. The JTTF Investigators asked TREISMAN about international travel. TREISMAN initially denied traveling internationally but later said he traveled to Canada on vacation with his mother.⁶

26. TREISMAN admitted he had an interest in terrorism and reads Wikipedia articles on the subject. He has lost friends because of his joking about incidents such as 9/11.

27. TREISMAN stated that he plays video games, including first-person shooter games, and he plays the video games and talks with people

⁶ A lease agreement in TREISMAN's van indicated he leased an apartment, in or around 2017, in Montreal under the alias Theiss, as found on the counterfeit Florida Driver License. JTTF Investigators have not determined whether TREISMAN used the counterfeit Florida Driver License to lease the apartment.

using a computer rather than a gaming console, such as the Sony PlayStation. Additionally, he stated that the gaming community idolizes terrorist attacks, racism, and sexism. TREISMAN denied ever threatening to harm anyone in "the real world."

28. TREISMAN previously lived in Seattle, Washington. He left Seattle and traveled to Long Beach, California, and stayed there for a period of weeks to obtain a driver's license. He said it was easier to obtain a driver's license in California than in Washington. From California, TREISMAN traveled across the United States to North Carolina over a period of about five days. He stopped in Kansas and purchased two firearms. He stopped in St. Louis, Missouri, and visited someone nicknamed "Gunter." TREISMAN did not know Gunter's true name, and he could not recall Gunter's exact telephone number but provided several digits. He traveled to New Hampshire and purchased a firearm. He stopped in New York City, New York, and visited the 9/11 Memorial. He traveled to West Virginia and purchased another firearm. He then traveled through Virginia into North Carolina. TREISMAN stopped in Fayetteville, North Carolina, and met up with Gunter. TREISMAN and Gunter went to Range 56, an unguarded and unmonitored range, and shot TREISMAN's firearms.

29. JTTF Investigators showed TREISMAN a comment posted to Reddit, in or around the end of February 2020, by user "AlextheBodacious" stating the following:

How do I dox⁷ in sub rosa?

I keep dying and being called pedo⁸ and want to kill people in real life about it. How can I find the addresses of those I hate and execute them for their crimes?

30. TREISMAN said that Sub Rosa was a video game that he played. Initially, he stated that he could not recall using the online alias AlextheBodacious or posting the referenced statement above. Later in the interview, JTTF Investigators again, directly asked TREISMAN if AlextheBodacious was his Reddit user name. TREISMAN sat back and began to affirmatively nod, but then stated he could not recall. Later, JTTF

⁷ Based on my training and experience, I know that to "dox" someone is an Internet-based practice where users search for and publish private information about an individual or organization with malicious intent. This information can include true name, telephone number, and physical address.

⁸ Open source review of dictionary.com for the term "pedo" defines it as a combining form meaning "child" used in the formation of compound words: pedophilia. Pedophilia is defined as sexual desire in an adult for a child.

Investigators asked TREISMAN what his intent was in making the statement on Reddit. Despite claiming repeatedly that he [TREISMAN] could not recall using the online alias or posting the statement, TREISMAN replied, "Shock factor."

31. TREISMAN was asked if he used Reddit from his phone or from a PC (i.e., a personal computer). In response he said he accessed Reddit using a computer, and then he paused and added, "which I no longer have." When asked what happened to the computer, TREISMAN said, "it got shut down" and that "it got like a physical bug, like an actual cockroach, that ate through the power cord." TREISMAN then said he bought a new computer.⁹

32. TREISMAN prepared a written statement denying an intent to harm anyone and claiming all online threats were part of a persona.

33. JTTF Investigators then turned the interview to the firearms. JTTF Investigators questioned TREISMAN about the Sig Sauer AR rifle (SN 20J041880). TREISMAN stated he purchased this firearm in New Hampshire

⁹ A damaged power cord, as a lone factor, would not render a computer inoperable or irreparable.

through a seller he met on Armslist.com¹⁰. TREISMAN stated he could not recall if he accessed Armslist via a cell phone or computer. TREISMAN stated he was pretty sure the seller was a resident of New Hampshire.

TREISMAN stated he met the seller in a parking lot to purchase the rifle for \$800, and it was a 5.56 caliber rifle. TREISMAN stated he could not remember the seller's name. TREISMAN stated he was living in a hotel in New Hampshire during the purchase of this firearm. TREISMAN stated he bought this firearm in the past couple of weeks between California and now, which he believed occurred between March 2020, and the present time.

TREISMAN stated he also had another upper¹¹ that he bought as a kit in Seattle.

¹⁰ Armslist.com is a classified advertisements website, accessible through a web browser, for firearms and firearms accessories. Options on the website allow buyers to search for sellers willing to ship or to sell in person. Not all sellers who use the site are required to have an FFL and identifying the end possessor in those purchases is very difficult.

¹¹ Per Title 27, Code of Federal Regulations, section 478.11, a firearm frame or receiver is "[t]hat part of a firearm which provides housing for the hammer, bolt or breechblock, and firing mechanism, and which is usually threaded at its forward portion to receive the barrel." Some firearms are constructed with receiver assemblies, which are split into an upper assembly and a lower assembly, each housing different components. JTTF

34. JTTF Investigators questioned TREISMAN about the Intratec 9 (Model AB-10, SN A050018). TREISMAN stated he bought it in Kansas off Armslist. TREISMAN stated he purchased this firearm loaded, with a round in the chamber, and that he bought it approximately last year or so. TREISMAN did not remember the guy's name he bought it from.

35. JTTF Investigators questioned TREISMAN about the Kel-Tec Sub-2000 (SN FTC43). TREISMAN originally stated he bought this firearm in Kansas, and then corrected himself that he purchased this firearm from a home-based Federal Firearms Licensee (FFL) in Seattle, Washington. TREISMAN told agents he bought some other guns in Kansas, but not this one. TREISMAN told agents he bought this firearm off Armslist, but through an FFL. TREISMAN stated, "I did a background check and everything and came back clear, so." JTTF Investigators asked TREISMAN what identification he used to purchase the firearm. TREISMAN responded, "I don't recall." JTTF Investigators asked TREISMAN if he used the Florida Driver License. TREISMAN responded, "No, not that I recall." JTTF Investigators told TREISMAN that the FFL had a copy of TREISMAN's

Investigators determined TREISMAN possessed two upper assemblies, or "receivers," and two lower assemblies, or "receivers," in his van.

counterfeit Florida Driver License and asked TREISMAN why he had a different story than the FFL. TREISMAN told agents that he wasn't saying that, he was just saying that he could not recall. JTTF Investigators had obtained, prior to their interview of TREISMAN, a photocopy of the ATF Form 4473 related to the purchase of the Kel-Tec Sub 2000 from an FFL in Snoqualmie, Washington. The ATF Form 4473 lists the purchaser as "Alexander NMN Theiss" with the date of birth of March 29, 1995. The name Alexander Theiss, with the date of birth March 29, 1995, is consistent with the false identification found in TREISMAN's wallet on May 28, 2020.

36. JTTF Investigators questioned TREISMAN about the Taurus Spectrum pistol (SN 1F039977). TREISMAN stated he bought this firearm within the past couple of weeks in West Virginia from a seller he met on Armslist. TREISMAN stated he thought it was brand new because the seller sold it to him in the box with the manual for \$200. TREISMAN told agents he could not remember the seller's name or handle from Armslist.

ADDITIONAL ONLINE INVESTIGATION

37. JTTF Investigators conducted online searches for the online aliases used by TREISMAN, and located a comment posted "1 year ago" to Reddit by user AlextheBodacious, believed to be TREISMAN:

Toolhead, more like narcissistic bitch who cant take an insult and would die in the gaids of 25

First post in 6 months

But leme tell you FUCK toolhead!!! I hate him!!

He dishes it out but he cant take it, I call him a mouse furry and a wagie cuck virgin and he bans me from his minecraft server! Im shook!

I want to do a school shooting! What do I do, /b/?

[emphasis added]

38. JTTF Investigators also uncovered an iFunny¹² account used by user AlextheBodacious, believed to be TREISMAN, where he posted a screenshot of a statement made by the Fraternal Order of Police regarding the death of Breonna Taylor with the following comments with user Hitchhiker00 on April 8, 2020:

¹² iFunny is a type of social media platform that has both a website and a mobile application, on which users can post internet memes. A meme is typically a humorous image, video, or piece of text that is copied and spread by internet users. An iFunny user typically has a page on which that user can post memes.

Hitchhiker00: It is quite possible the Molotov brigade is taking notes...

AlextheBodacious: gonna hold a coup?

Hitchhiker00: this is going to happen sooner or later, not a coup but the citizens will fight back when they cant stand it any more. If history is a guide. its coming.

AlextheBodacious: well I am

Hitchhiker00: Remember one thing. in a decision like this. you must be willing to sacrifice your life for justice. If you cannot do that, you aren't ready.

AlextheBodacious: I was going to do a columbine for a while. I think it would be better to put it towards something more memorable

Hitchhiker00: Don't harm the innocent. If you want to be remembered PROTECT the innocent. Turn your anger towards murders and those who understand it.

AlextheBodacious: my hatred is for the complacent American people who will turn u in for their own satisfaction. But aside from former

goals, my eyes are on the future. If anything I have to save bernie¹³ while I can.

39. JTTF Investigators also uncovered an image posted on iFunny on April 15, 2020 by user AlextheBodacious with the text, "should I kill joe biden?" Analysis of returns received as a result of legal process served to Chase Bank and Sprint Corporation for financial transaction and cell site location data for TREISMAN's bank card and phone revealed TREISMAN was in Wilmington, Delaware on May 3, 2020 and, on at least one occasion, was within four miles of Joe Biden's residence at 1209 Barley Mill Rd Wilmington, Delaware.

FBI SEARCH OF TREISMAN'S PHONE

40. On June 3, 2020, based on the forgoing information, the FBI obtained a federal search and seizure warrant from the Honorable Joe L. Webster, Magistrate Judge, U.S. District Court for the Middle District of North Carolina, to forensically examine and search TREISMAN's Samsung S9 wireless telephone, IMEI 353306090607320, associated with telephone

¹³ Based off a review of TREISMAN's internet search history, online posts, and online comments, "bernie" is believed to be Vermont Senator Bernie Sanders. Sanders dropped out of the 2020 Presidential race on April 8, 2020.

number (206) 293-0658¹⁴, for records related to violations of Title 18, U.S.C. Section 924(b); that is receiving and transporting firearms and ammunition in interstate commerce with the intent to commit a felony offense. The warrant was served the same day and the device was transported to the FBI Charlotte Field Office in the Western District of North Carolina.

41. On June 3, 2020, subsequent to the transport of TREISMAN's phone to the FBI Charlotte Field Office, JTTF Investigators began examining the content of the device, pursuant to the federal search warrant. As a result, the JTTF Investigators uncovered numerous videos and files, to include videos of the New Zealand Mosque shooting, online searches from April 4, 2020 to April 30, 2020 for "sam woodward¹⁵," "background checks required for public sales," and a downloaded file from armslist.com titled "Fayetteville-north-carolina-shotguns-for-sale-trade". The device also contained a video recorded on April 23, 2020 of an airplane at an airport behind a chain-link

¹⁴ IMEI 353306090607320 and telephone number (206) 293-0658 are associated with the wireless phone seized by KPD incident to TREISMAN's arrest.

¹⁵ Sam Woodward, in 2018, murdered a 19-year-old in Orange County, California, stabbing him 20 times. Woodward was a member of the neo-Nazi group Atomwaffen.

fence, where TREISMAN is heard saying, "Now I'm not saying you should, I'm just saying you could, hypothetically, cut right through the chain link fence and make your way right onto that airplane right there. Hijack it and fly it into a building. Now should you? No. But admittedly that would be fucking awesome, and if you can you definitely shou-, um, well, well yeah."

42. JTTF Investigators also uncovered multiple online searches from TREISMAN's phone that occurred from April 17, 2020 to May 17, 2020 for "joe biden," "joe biden house," "1209 barley mill rd wilmington¹⁶," and "does the vp get secret service for life".

43. Additional evidentiary items obtained from TREISMAN's phone is a "Note" stored in the phone on or about October 15, 2019, which displays the following text:

That being said, the satisfaction of it justifies anything else. I hate crikens and normies and karens so much it makes it worth it to go through with it. So heres my plan: on christmas or black friday, go to the mall food court with worktunes (great bass), a respirator (if teargas

¹⁶ 1209 Barley Mill Rd Wilmington, Delaware is a publicly known residence for Joe Biden.

is used) and a weapon of choice (i like the ab-10, its concealable and comes with a 30 rounder by default, though everyone chooses the ar15, im not saying its normie, just overused).

44. Regarding "the ab-10" as "a weapon of choice" in the "plan" quoted above, KPD officers found an Intratec 9mm Luger Model AB-10, SN. A050018, in a clothes hamper, in the Honda driven by TREISMAN when he was encountered at the Fifth Third Bank in Kannapolis, North Carolina on May 28, 2020. Additionally, TREISMAN stated in an interview with JTTF Investigators the next day that he bought the AB-10 in Kansas off Armslist. TREISMAN stated he purchased this firearm loaded, with a round in the chamber, and that he bought it approximately last year or so.

45. An additional search of TREISMAN's phone conducted by FBI Violent Crimes Against Children Investigators on June 4, 2020 pursuant to a federal search warrant that identified hundreds of images and videos appearing to be sexually explicit images of minors, evidence of violation of Title 18 U.S.C. § 2252A(a)(5)(B), possession of child pornography.

FBI SEARCH OF TREISMAN'S OTHER DEVICES

46. On July 13, 2020, the FBI obtained a federal search and seizure warrant from the Honorable Joi Elizabeth Peake, Magistrate Judge, U.S.

District Court for the Middle District of North Carolina, to forensically examine and search TREISMAN's electronic data storage media, including computers, a wireless telephone, a camera, hard drives, USB drives, and SD memory cards for material related to violations of 18 U.S.C. § 2252A. On June 17, 2020, a search of the Lenovo IdeaPad 320 laptop computer by the Charlotte FBI Violent Crimes Against Children Investigators identified potential material relating to violations of Title 18, U.S.C. § 924(b) and requested the material be reviewed by Charlotte FBI JTTF Investigators.

47. A review of the material revealed a screenshot taken on May 16, 2020 of a note written in Notepad¹⁷. The note was a list that contained the following:

fridge

field

go out and see things you wouldn't see from google maps. What kind of gate is there?

¹⁷ Notepad is an application that comes preloaded on most computers and laptops that run the Microsoft Windows operating system. The application allows for a user to type and save text.

Routes

instances

think of every scenario

d

get everything set up

execute

48. JTTF Investigators determined the observed image was consistent with a surveillance and attack plan connected to a possible threat against Joe Biden or other targeted act of violence and was evidence of a violation of Title U.S.C. § 924(b) and Title 18, U.S.C. § 922(a)(6), consistent with other evidentiary items discovered during the course of the investigation.

49. During the search of the Seagate Pipeline 500 GB hard drive, JTTF Investigators uncovered a document appearing to have been authored by TREISMAN, titled "A Guide to Mass Shooting," which contained an opening paragraph and the outline of three chapters: Reasoning, Preparation, and Showdown.

50. Violent Crimes Against Children Investigators discovered 1248 videos and 6721 images consistent with the statutory definition of child pornography found on nine of TREISMAN's electronic devices.

DISCOVERY AND USE OF DISCORD

51. An interview with a person who was previously an online associate of TREISMAN revealed TREISMAN was active on Discord and used Discord user name's Flippy Mapper, Thanos Car, and Mikey Kosterello. He also knew TREISMAN used the user names Alex Theiss, Alex the Bodacious, and Alex T for other applications and email accounts. White had seen videos and screen captures of TREISMAN attempting to upload child pornography onto Discord. White also saw pictures of an AR-15 and Tec-9 posted by TREISMAN on Discord. He also observed several outbursts by TREISMAN on Discord where TREISMAN would say, "What if I just shot up a Wal-Mart?" or a similar violent phrase on several occasions.

52. During searches of TREISMAN's S-9 Samsung phone, Lenovo laptop, and Seagate Pipeline 500 GB hard drive, JTTF Investigators discovered the Discord application, files associated with the use of the Discord application, and screenshots of TREISMAN's known usernames in the Discord Application.

53. An open source search revealed the YouTube video "Flippy Mapper is a Pedophile," which shows TREISMAN speaking in Discord telling other users about websites with sexually explicit images of children as well as being able to purchase people with Bitcoin.

54. Legal process received from Discord on June 15, 2020 revealed an account linked to alexthebodacious@gmail.com¹⁸, a known account used by TREISMAN, that provided a user ID of 379095882198548481 and username of Thanos Car#8616.

55. A Confidential Human Source who is familiar with the game Sub Rosa and Discord provided the FBI an additional account for TREISMAN under the moniker "MikeyKosterello," that has been deleted and is now listed as "Deleted User 804f67fb#4994." In my training and experience, I know once a Discord user account is deleted, the comments made by the user remain viewable in historical chat and conversations.

56. A review of the Scan Disk thumb drive found in TREISMAN's van revealed a screenshot of a Discord account used by TREISMAN with the account name Mikeykosotorellio#7938. The email, gasmertime@gmail.com,

¹⁸ TREISMAN listed the email alexthebodacious@gmail.com on his application for a US passport issued on 03/17/2016.

was also discovered in an archived Gmail file on TREISMAN's Seagate Pipeline 500 GB hard drive indicating he used the email to register for an additional account with Discord. During the review of TREISMAN's Seagate Pipeline 500 GB hard drive, a Chrome file linked to Gmail containing the file information "MergedPersonSourceOp" which was found with the Gmail accounts gasmertime@gmail.com, dogeborger@gmail.com, moppyflopper@gmail.com, asdadsasdasddasasdsdaa@gmail.com, and gamerclub9999@gmail.com. Based off my training and experience, I know it is possible to link multiple Gmail accounts all used by the same user, which allows files and information to be moved from one account to another.

57. An interview with an additional online associate of TREISMAN who played Sub Rosa and was active on Discord stated TREISMAN had been banned multiple times from Discord, but would rejoin using different accounts. I know that in order to create a Discord account, a user must provide a unique email that is not linked to an existing account. JTTF investigators believe TREISMAN used multiple email accounts to create multiple Discord accounts.

CONCLUSION

58. Based on my training and experience, and the facts as set forth in this affidavit, there is probable cause to believe TREISMAN received or

transported firearms or ammunition in interstate commerce with the intent to commit an offense, punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Section 924(b), knowingly provided false information in connection with the acquisition of a firearm, in violation of Title 18, United States Code, Section 922(a)(6), and possessed child pornography, in violation of 18 U.S.C. § 2252A(a)(5)(B).

59. Specifically, TREISMAN used a false name in the acquisition of a Kel-Tec firearm. He liquidated his inheritance, traveled across the country purchasing firearms using cash, with fraudulent identification, with the intent to commit a mass shooting or targeted act of violence, an offense punishable under numerous statutes as a felony. TREISMAN has repeatedly expressed adoration for mass shooters and a desire to commit a mass shooting himself. Additionally, a wireless telephone and other electronic storage devices belonging to TREISMAN were reviewed by the FBI pursuant to search warrants and found to contain evidence of child pornography.

60. Based on my training and experience, and the facts as set forth in this affidavit, there is probable cause to believe that the Accounts described in Attachment A contain additional evidence, as detailed in Attachment B, of the Subject Violations.

61. I submit that this affidavit supports probable cause for a search warrant authorizing the examination of the Accounts described in Attachment A to seize the items described in Attachment B.

62. I further submit there is reasonable cause for the Court to authorize execution of the warrant at any time in the day or night, because the warrant will be served on Discord, who will then compile the requested records at a time convenient to it.

Respectfully submitted,

/S/ Christopher McMaster
Christopher McMaster
Special Agent
Federal Bureau of Investigation

In accordance with Rule 4.1(b)(2)(A), the Affiant attested under oath to the contents of this Affidavit, which was submitted to me by reliable electronic means, on this 6th day of October, 2020, at 11:46a.m.



JOE L. WEBSTER
UNITED STATES MAGISTRATE JUDGE
MIDDLE DISTRICT OF NORTH CAROLINA

ATTACHMENT A

This warrant applies to information associated with the Discord accounts associated with the following account usernames or associated account identifiers: Thanos Car#8616, user ID of 379095882198548481; Mikeykosotorello#7938; Deleted User 804f67fb#4994; gasmertime@gmail.com; dogeborger@gmail.com; mopyflopper@gmail.com; asdadsasdasddasasdsdaa@gmail.com; and gamerclub9999@gmail.com which is stored at premises owned, maintained, controlled, or operated by Discord headquartered at 401 California Dr, Burlingame, California 94010.

ATTACHMENT B

This warrant authorizes (i) the search of the property identified in Attachment A for only the following and (ii) authorizes the seizure of the items listed below only to the extent they constitute the following:

(a) evidence of violations of 18 U.S.C. § 924(b), 18 U.S.C. § 922(a)(6), and 18 U.S.C. § 2252A(a)(5)(B) ("subject violations"); or

(b) any item constituting contraband due to the subject violations, fruits of the subject violations, or other items possessed whose possession is illegal due to the subject violations; or

(c) any property designed for use, intended for use, or used in committing any subject violations.

Subject to the foregoing, the items authorized to be seized include the following:

I. Information to be disclosed by Discord.

To the extent that the information described in Attachment A is within the possession, custody, or control of Discord, including any emails, chats, images, records, files, logs, or information that have been deleted but are still available to Discord, or have been preserved pursuant to a request made

under 18 U.S.C. § 2703(f), Discord is required to disclose the following information to the government for each account or identifier listed in Attachment A in the form of:

- a. The contents of all chats associated with the account, including stored or preserved copies of chats sent to and from the account, the source and destination addresses associated with each chat, the date and time at which each chat was sent, and the size and length of each chat;
- b. All records or other information regarding the identification of the account, to include full name, physical address, telephone numbers and other identifiers, records of session times and durations, the date on which the account was created, the length of service, the IP address used to register the account, log-in IP addresses associated with session times and dates, account status, alternative e-mail addresses provided during registration, methods of connecting, log files, and means and source of payment (including any credit or bank account number);
- c. The types of services utilized;
- d. All records or other information stored at any time by an individual using the account, including address books, contact and buddy lists, calendar data, pictures, and files;

e. All records pertaining to communications between Discord, and any person regarding the account, including contacts with support services and records of actions taken.

II. Information to be seized by the government

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. §§ 924(b), 18 U.S.C. §§ 922(a)(6), and 18 U.S.C. § 2252A(a)(5)(B), including, for each account or identifier listed on Attachment A, information pertaining to the following matters:

- a. All images depicting children engaging in sexually explicit conduct as defined in 18 U.S.C. § 2252A(a)(5)(B),
- b. All electronic communications regarding children engaging in sexually explicit conduct;
- c. All communications with potential minors involving sexual topics or in an effort to seduce the minor;
- d. Any evidence that would tend to identify the person using the account when any of the items listed in subparagraphs a-c were sent, read, copied or downloaded;

e. Records relating to who created, used, or communicated with the account or identifier, including records about their identities and whereabouts;

f. records related to firearm and ammunition purchases and sales;

g. records related to the acquisition of any firearms, ammunition, explosives, tactical gear, or any other weapon or equipment that could be used to conduct assaults, mass shootings, murders, or terrorist attacks,

h. communications and any other records relating to assaults, communicated threats, mass shootings, murders, and terrorist attacks, or the planning thereof;

i. records regarding obtaining fraudulent identification, or the use of any fraudulent identification;

j. records related to firearms or tactical training;

k. records related to the use of social media and gaming platforms including user names and buddy lists.